REMARKS

Claims 1-16 and 18-20 are pending in the present application. By this amendment, claims 1, 5-6, 8-16, and 18-20 are amended, and claim 17 is canceled without prejudice. Applicants respectfully request reconsideration of the present claims in view of the foregoing amendments and the following remarks.

I. Claim Rejections

Claims Rejections Under 35 U.S.C. §102(e)

Claims 1-9 and 12-15 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 6,157,705 to Perrone (hereinafter "Perrone"). This rejection is respectfully traversed.

A. Claims 1-9 are allowable.

As amended, claim 1 recites that a Visual Interactive Voice Response (VIVR) system for delivering information during a VIVR session comprises a network element operative to receive a VIVR session identification (Session ID) associated with a networking device; receive a directory number associated with a telecommunications device; and determine whether the Session ID associated with the networking device includes the directory number associated with the telecommunications device; and a VIVR Server operative to send voice-based information to the telecommunications device and to send visual-based information to the networking device, in response to the receipt of a VIVR session request, if the Session ID associated with the networking device includes the directory number associated with the telecommunications device.

Perrone does not teach, suggest, or describe a VIVR system for delivering information during a VIVR session as recited by claim 1. On the contrary, Perrone describes a system for controlling a remote server by a voice command including an interactive voice response (IVR) system operative to receive an incoming call from an end user's telephone, generate a unique session identifier, and play a recorded greeting to the end user that includes a session identifier; and a server operative to connect with a

client computer, display a homepage including a prompt that requests the end user to enter the session identifier in a data entry field, receive the session identifier entered by the end user, and send a message to the IVR system asking whether the IVR system recognizes the session identifier. If the IVR system indicates that the session is recognized, Perrone describes that the HTTP session, a port of the IVR system, and an interactive voice session are all associated with one another so that they can be coordinated. This is not analogous to the system recited by claim 1 because Perrone fails to teach, suggest, or describe a network element operative to receive a Session ID associated with the client computer, receive a directory number associated with the end user's telephone, and determine whether the Session ID associated with the client computer includes the directory number associated with the end user's telephone. Perrone also fails to teach, suggest, or describe that the server is operative to send voice-based information to the end user's telephone and to send visual-based information to the client computer, in response to the receipt of a VIVR session request, if the Session ID associated with the client computer includes the directory number associated with the end-user's telephone. Instead, Perrone describes that the IVR system generates a unique session identifier that is provided to the end user when a call from the end user's telephone is received by the IVR system and that the server sends a message to the IVR system to determine if the IVR system recognizes the session identifier after the end user inputs the session identifier into the home page provided by the server.

For at least the reasons given above, claim 1 is allowable over Perrone. Since claims 2-9 depend from claim 1 and recite additional features, Applicants respectfully submit that Perrone does not anticipate or make obvious Applicants' claimed invention as embodied in claims 2-9 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

B. Claims 12-15 are allowable.

As amended, claim 12 recites that a method for simultaneously delivering voice-based information and visual-based information comprises establishing an Internet connection between a networking devices and a server; receiving a data packet associated

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with the networking device; establishing a telephonic connection between a telecommunications device and the server; receiving a directory number associated with the telecommunications devices; determining whether the data packet associated with the networking device includes the directory number associated with the telecommunications device; if the data packet associated with the networking device includes the directory number associated with the telecommunications device, then delivering the voice-based information to the telecommunications device over the telephonic connection; delivering the visual-based information to the networking device over the Internet connection; and modifying the delivery of the voice-based information in response to receiving an instruction over the Internet connection.

Perrone does not teach, suggest, or describe a method for simultaneously delivering voice-based information and visual-based information as recited by claim 12. In contrast, Perrone describes a method of controlling a remote server by a voice command including establishing a connection between a client computer and a server; displaying a home page containing a prompt that requests the end user to enter a session identifier; establishing a connection between the end user's telephone and an IVR system; providing the end user with a session identifier; receiving the session identifier entered by the end user into a data entry field of the home page; associating the IP address of the client computer with the received session identifier; sending a message to the IVR system to determine if the IVR system recognizes the session identifier; and if the IVR system recognizes the session identifier, then associating a HTTP session, a port of the IVR system, and an interactive voice session with one another so that they can be coordinated. This is not analogous to the method recited by claim 12 because Perrone fails to teach, suggest, or describe receiving a data packet associated with the client computer; receiving a directory number associated with the end user's telephone; determining whether the data packet associated with the client computer includes the directory number associated with the end user's telephone; and if the data packet associated with the client computer includes the directory number associated with the end user's telephone, then delivering the voice-based information to the end user's telephone over the telephonic connection; delivering the visual-based information to the client computer over the Internet

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connection; and modifying the delivery of the voice-based information in response to receiving an instruction over the Internet connection. Instead, Perrone describes providing a session identifier to the end user when the end user calls the IVR system; receiving the session identifier entered by the end user in a data entry field of a homepage; determining if the IVR system recognizes the session identifier; and if so, then associating an HTTP session, a port of the IVR system, and an interactive voice session with one another so that they can be coordinated.

For at least the reasons given above, claim 12 is allowable over Perrone. Since claims 13-15 depend from claim 12 and recite additional features, Applicants respectfully submit that Perrone does not anticipate or make obvious Applicants' claimed invention as embodied in claims 13-15 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claim Rejections Under 35 U.S.C. §103(a)

Claims 10-11 and 16-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Perrone in view of what is well known in the art. As noted above, claim 17 is canceled without prejudice, rendering the rejection to this claim moot. This rejection is respectfully traversed.

A. Claims 10-11 are allowable.

For at least the reasons stated above, claim 1 is allowable over Perrone. Since claims 10-11 depend from claim 1 and recite additional features, Applicants respectfully submit that the combination of Perrone in view of what is well know in the art does not make obvious Applicants' claimed invention as embodied in claims 10-11 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested. Moreover, Applicants respectfully assert that the Examiner's assertion that "VXML is a well known standard, which had been developed simplifying the using is voice recognition or voice interaction applications" is inappropriate because VXML is an assertion of specific knowledge of the art which must be supported by citation of some

reference work recognized as a standard in the pertinent art. Therefore, Applicants respectfully request that the Examiner support his assertion with adequate evidence.

      B. Claims 16 and 18-20 are allowable.

      As amended, claim 16 recites that a Visual Interactive Voice Response (VIVR) system for delivering information during a VIVR session comprises a network element operative to receive a VIVR session identification (Session ID) associated with a networking device; receive a directory number associated with a telecommunications device; and determine whether the Session ID associated with the networking device includes the directory number associated with the telecommunications device; a VIVR Server operative to deliver voice-based information to the telecommunications device and to deliver visual-based information to the networking device, if the Session ID associated with the networking device includes the directory number associated with the telecommunications device; and the network element further operative to route a call from the telecommunications device to the VXML Gateway, in response to a determination that the Session ID associated with the networking device includes the directory number associated with the telecommunications devices.

      Perrone does not teach, suggest, or describe a Visual Interactive Voice Response (VIVR) system for delivering information during a VIVR session as recited by claim 16. On the contrary, Perrone describes a system for controlling a remote server by a voice command including an IVR system operative to receive an incoming call from the end user's telephone, generate a unique session identifier, and play a recorded greeting to the end user that includes a session identifier; and a server operative to connect with a client computer, display a homepage including a prompt that requests the end user to enter the session identifier in a data entry field, receive the session identifier entered by the end user, and send a message to the IVR system asking whether the IVR system recognizes the session identifier. If the IVR system indicates that the session is recognized, Perrone describes that the HTTP session, a port of the IVR system, and an interactive voice session are all associated with one another so that they can be coordinated. This is not analogous to the system recited by claim 16 because Perrone fails to teach, suggest, or

describe a network element operative to receive a Session ID associated with the client computer, receive a directory number associated with the end user's telephone, to determine whether the Session ID associated with the client computer includes the directory number associated with the end user's telephone, and to route the call from the end user's telephone to a VXML Gateway, in response to a determination that the Session ID associated with the client computer includes the directory number associated with the end user's telephone; and a VIVR Server operative to deliver voice-based information to the end user's telephone and to deliver visual-based information to the client computer, if the Session ID associated with the client computer includes the directory number associated with the end user's telephone. Instead, Perrone describes that the IVR system generates a unique session identifier that is provided to the end user when a call from the end user is received by the IVR system and that the server sends a message to the IVR system to determine if the IVR system recognizes the session identifier after the end user inputs the session identifier into the home page provided by the server.

The Office Action relies on what is well known in the art to allegedly overcome the deficiencies of the teaching of Perrone. However, Applicants assert that a system comprising a network element operative to receive a Session ID associated with a networking device; receive a directory number associated with a telecommunications device, determine whether the Session ID associated with the networking device includes the directory number associated with the telecommunications device, and to route a call from the telecommunications device to a VXML Gateway, in response to a determination that the Session ID associated with the networking device includes the directory number associated with the telecommunications devices; and a VIVR Server operative to deliver voice-based information to the telecommunications device and to deliver visual-based information to the networking device, if the Session ID associated with the networking device includes the directory number associated with the telecommunications device is not well known in the art. Moreover, Applicants respectfully assert that the Examiner's assertion that "VXML is a well known standard, which had been developed simplifying the using is voice recognition or voice interaction applications" is inappropriate because
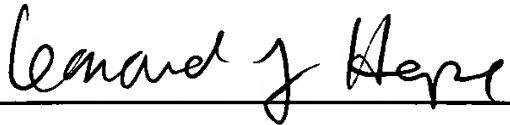
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VXML is an assertion of specific knowledge of the art which must be supported by citation of some reference work recognized as a standard in the pertinent art. Therefore, Applicants respectfully request that the Examiner support his assertion with adequate evidence.

For at least the reasons given above, claim 16 is allowable over the combination of Perrone and what is well known in the art. Since claims 18-20 depend from claim 16 and recite additional features, Applicants respectfully submit that the combination of Perrone and what is well known in the art does not make obvious Applicants' claimed invention as embodied in claims 18-20 for at least these reasons. Accordingly, withdrawal of this rejection is respectfully requested.

CONCLUSION

For at least these reasons, Applicant asserts that the pending claims 1-16 and 18-20 are in condition for allowance. The Applicants further assert that this response addresses each and every point of the Office Action, and respectfully request that the Examiner pass this application with claims 1-16 and 18-20 to allowance. Should the Examiner have any questions, please contact Applicants' undersigned attorney at 404.954.5042.

Respectfully submitted,

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